

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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2025 MAR 4 P 1:46

UNITED STATES OF AMERICA,

Plaintiff,

Case No.

25-CR-041

3:25-378 (M)

v.

[21 U.S.C. §§ 846, 841(a)(1) &
841(b)(1)(B); 18 U.S.C. §§ 922(g)(1),
924(a)(8), 924(c)(1), & 2(a)]

STEVEN RAMOS-SERRA,
a/k/a "Steven De Niro," and
LLOYD RODRIGUEZ,
a/k/a "Coyo," "Koyo,"

[SEALED]

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Beginning in or about January 2024, and continuing through on or about November 8, 2024, in the State and Eastern District of Wisconsin and elsewhere,

**STEVEN RAMOS-SERRA,
a/k/a "Steven De Niro," and
LLOYD RODRIGUEZ,
a/k/a "Coyo," "Koyo,"**

knowingly and intentionally conspired together and with other persons known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The amount of controlled substance involved in the conspiracy attributable to each defendant as a result of their own conduct, and the conduct of other conspirators reasonably

foreseeable to them, includes 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about November 5, 2024, in the State and Eastern District of Wisconsin and elsewhere,

**STEVEN RAMOS-SERRA,
a/k/a “Steven De Niro,” and
LLOYD RODRIGUEZ,
a/k/a “Coyo,” “Koyo,”**

did knowingly and intentionally possess with intent to distribute a controlled substance.

2. The offense involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2024, in the State and Eastern District of Wisconsin,

**LLOYD RODRIGUEZ,
a/k/a “Coyo,” “Koyo,”**

did knowingly possess a firearm in furtherance of the drug trafficking crimes charged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about November 8, 2024, in the State and Eastern District of Wisconsin,

**LLOYD RODRIGUEZ,
a/k/a “Coyo,” “Koyo,”**

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Springfield Armory 9mm handgun, bearing serial number BY420764.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE NOTICE

1. Upon conviction of the controlled substance offenses set forth in Counts One and Two of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including but not limited to, the following: a sum of money representing the amount of proceeds obtained as a result of the offenses.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

3. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c) set forth in Count Three of this Indictment or Title 18, United States Code, Section 922(g)(1) set forth in Count Four of this Indictment, the defendant, LLOYD RODRIGUEZ, a/k/a “Coyo,” “Koyo,” shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the knowing violation of Sections 924(c) and/or 922(g)(1), including, but not limited to a Smith & Wesson SW40VE, .40 caliber pistol, bearing serial number RAZ4009.

A TRUE BILL:



FOREPERSON

Date: 3/4/25

A handwritten signature in blue ink, appearing to read 'R. Frohling', written over a horizontal line.

RICHARD G. FROHLING
Acting United States Attorney